

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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**Matthew Leipolt  
Christopher Adams,**

**On behalf of themselves and  
all others similarly situated**

**Plaintiffs**

**v.**

**Case No. 15-CV-628**

**All-Ways Contractors Inc.**

**Defendant.**

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**PLAINTIFFS' MOTION TO COMPEL DISCOVERY**

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Plaintiffs, by their attorneys, hereby moves the Court pursuant to Rule 37, Federal Rules of Civil Procedure, to enter an order requiring the Defendant to provide supplemental responses to the Plaintiffs' first set of discovery requests, and to provide other appropriate relief to the Plaintiffs. This motion is supported by the attached memorandum of law, the declaration of Yingtao Ho, and exhibits attached thereto.

WHEREFORE, Plaintiffs respectfully request for the Court to enter an order that:

1. Requires the Defendant to provide supplemental responses to interrogatories #1, #3, #8, #10, #11, and #12, and document requests #2-#4, and #14 from the Plaintiffs' first set of discovery requests, in the manner outlined in the supporting memorandum of law;
2. Stays the deadline for the Plaintiffs to file their motion for conditional certification, until thirty (30) days after the Defendant has produced to the Plaintiffs the names, time records, and check stubs for all of its drivers and field employees, for the time period on or

after May 21, 2012;

3. Awards to the Plaintiffs their reasonable attorneys fees and costs incurred in bringing this motion to compel discovery.

Respectfully submitted this 21<sup>th</sup> day of December, 2015.

/s/Yingtao Ho\_\_\_\_\_

Yingtao Ho

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